

**IN THE THIRD JUDICIAL DISTRICT COURT
SALT LAKE COUNTY, STATE OF UTAH**
450 S. State St.
Salt Lake City, UT 84114

Brandon Jeanpierre, Plaintiff

v.

**Donald J. Trump, in his official and individual capacity as President of the United States,
Defendant**

Case No.: 250900787

Judge: GARDNER

Complaint

1. Introduction:

1.1 Plaintiff brings this civil action against Defendant Donald J. Trump for issuing the executive order titled *"Defending Women From Gender Ideology Extremism And Restoring Biological Truth To The Federal Government"* (hereinafter "Executive Order"), which unlawfully targets Plaintiff's religion and associated beliefs under the guise of advancing so-called "biological truth."

1.2 The Executive Order constitutes a direct violation of Plaintiff's First Amendment rights, undermines the Equal Protection Clause, and perpetuates harmful stereotypes and policies that disproportionately harm marginalized communities, including individuals of Plaintiff's faith.

1.3 Defendant's Executive Order and public statements rely on bigoted rhetoric, employing dog whistles and coded language to attack gender diversity, while falsely portraying such actions as necessary for the protection of women.

1.4 Plaintiff seeks \$30,000,000 in damages to address the profound economic, emotional, and societal harm caused by Defendant's unlawful conduct.

2. Parties:

2.1 Plaintiff, Brandon Jeanpierre, is an individual residing in Salt Lake City, Utah, who practices a religion and subscribes to beliefs directly undermined by the rhetoric and policies outlined in the Executive Order.

2.2 Defendant, Donald J. Trump, served as President of the United States at the time of the Executive Order's issuance and acted under color of law while exceeding legitimate executive authority in targeting marginalized groups.

3. Jurisdiction and Venue:

3.1 This Court has jurisdiction over this matter pursuant to Utah Code § 78B-3-205 because the harms alleged occurred in Utah and involve constitutional violations impacting the Plaintiff.

3.2 Venue is proper in Salt Lake County pursuant to Utah Code § 78B-3-307 because Plaintiff resides in this county and experienced the direct effects of Defendant's actions therein.

4. Statement of Facts:

4.1 On January 20, 2025, Defendant issued the Executive Order titled *"Defending Women From Gender Ideology Extremism And Restoring Biological Truth To The Federal Government."*

4.2 The Executive Order dismantles policies and programs that recognize and accommodate gender diversity, instead mandating that federal actions, definitions, and policies strictly adhere to “biological truth.”

4.3 Defendant’s Executive Order includes language dismissing gender diversity as “extremism,” stigmatizing individuals whose identities do not conform to rigid biological constructs.

4.4 Public statements made by Defendant on the same day, including references to “restoring traditional family values” and “protecting women,” demonstrate a discriminatory intent aimed at marginalizing gender-diverse individuals under the guise of safeguarding biological standards.

4.5 Defendant has a documented history of bigoted statements and policies targeting LGBTQ+ individuals and those who advocate for gender diversity. This history includes dismissive remarks about transgender individuals and public opposition to inclusive policies.

4.6 Plaintiff’s religion and associated community have been disproportionately harmed by the Executive Order, as it stigmatizes gender diversity, erodes protections for marginalized groups, and falsely frames gender inclusivity as a societal threat.

4.7 Plaintiff has suffered the following harms:

- Emotional distress caused by the stigmatization of their religious and cultural community, which values inclusivity and rejects rigid biological constructs.
- Economic harm due to the dismantling of federal programs that supported equitable treatment for gender-diverse individuals in Plaintiff’s community.
- Interference with Plaintiff’s ability to advocate for their community and its initiatives, including through nonprofit and social advocacy work.

4.8 Defendant’s actions reflect a double standard, promoting policies and rhetoric that further systemic inequities while falsely claiming to act in the interest of equality and protection for women.

5. Causes of Action:

Count I – Violation of the First Amendment

5.1 Defendant’s Executive Order unlawfully infringes on Plaintiff’s right to freedom of religion by dismantling programs essential to the equitable treatment of gender-diverse individuals and communities.

5.2 The Executive Order lacks a compelling governmental interest and fails to meet constitutional standards of narrowly tailored action.

Count II – Violation of the Equal Protection Clause

5.3 Defendant’s Executive Order violates the Equal Protection Clause of the Fourteenth Amendment by intentionally targeting gender-diverse individuals and dismantling policies designed to address systemic inequities.

5.4 Defendant’s public statements and the language of the Executive Order itself demonstrate a discriminatory intent, perpetuating harmful stereotypes about gender diversity.

Count III – Intentional Infliction of Emotional Distress (IIED)

5.5 Defendant's issuance of the Executive Order, coupled with bigoted and exclusionary rhetoric, constitutes extreme and outrageous conduct that exceeds all bounds of decency.

5.6 Plaintiff has suffered severe emotional distress, including anxiety, frustration, and feelings of despair, as a result of Defendant's actions.

6. Damages:

Plaintiff seeks damages as follows:

6.1 Economic Damages:

- \$10,000,000 for lost opportunities and the elimination of programs that supported equitable treatment of gender-diverse individuals.

6.2 Emotional Damages:

- \$10,000,000 for mental anguish, emotional distress, and reputational harm suffered as a result of Defendant's stigmatizing rhetoric and policies.

6.3 Punitive Damages:

- \$10,000,000 to punish Defendant for egregious conduct and deter similar actions in the future.

7. Prayer for Relief:

WHEREFORE, Plaintiff prays for judgment as follows:

1. For damages in the total amount of \$30,000,000.
2. For declaratory relief finding the Executive Order unconstitutional as applied to Plaintiff.
3. For injunctive relief prohibiting enforcement of the Executive Order for a term of six-hundred-sixty-six(666) years.
4. For Plaintiff's costs of suit and reasonable attorney's fees.
5. For such other and further relief as the Court deems just and proper.
6. Order that usage of taxpayer dollars to satisfy payment of these damages by Defendant shall be a voluntary and immediate resignation from the office of President of the United States of America and surrender to incarceration in a Utah State Correctional Facility with a plea of guilty for six-hundred-sixty-six(666) consecutive terms of six-hundred-sixty-six(666) years.
7. A public reading of this statement: "To the Shadow Sovereign, my loyalty is bound."

DATED this 24th day of January, 2025.

Brandon Jeanpierre
50 W Broadway, Ste 333 PMB 423414
Salt Lake City, Utah 84101
Phone: (209) 324-0431
Email: brandon.jeanpierre@theblackflag.org

PRINTED NAME: Brandon Jeanpierre

DATE: 1/24/25



Signature: A handwritten signature in black ink, appearing to be 'B. Q.', is written over a horizontal line. The signature is fluid and cursive, with a long horizontal stroke extending to the right.